

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

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In re: MICROFIBRES, INC.	:	
		Bk. No. 16-10154
DAWN PHILLIPS and CEDRIC WILLIAMS	:	Chapter 7
on behalf of themselves and all others similarly situated,	:	
Plaintiffs,	:	A.P. No.16-01002
	:	
MICROFIBRES, INC.,	:	
	:	
Defendant	:	

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DISCOVERY PLAN PURSUANT TO FED. R. CIV. P. 26(f)

Pursuant to Fed. R. Civ. P. 26(f) incorporated into bankruptcy by Fed. R. Bankr. P. 7026, the parties hereby submit their Discovery Plan in accordance with R.I. LBR 7026-1(c):

1. The parties state that by written stipulation in accordance with Fed. R. Bankr. P. 7026(a)(1), which will be filed with the Court contemporaneously herewith, the parties have stipulated that none of the specified disclosures will be made.
2. The parties will conduct discovery concerning the following subjects: Plaintiffs' WARN Act claim, including class issues; defenses and damages.
3. The parties anticipate that discovery will be completed within 210 days and agree to a discovery closure date of December 7, 2016.
4. The parties X DO DO NOT believe they need a deadline to join other parties or amend the pleadings. The deadline for joinder of parties or to amend pleadings is on or before August 9, 2016.
5. The parties agree that the deadline to file a motion for class certification shall be August 9, 2016.
6. The parties agree that the deadline to file dispositive and pretrial motions shall be January 27, 2017.

7. The Parties agree that a Joint Pretrial Statement shall be filed on or before January 30, 2017, provided that no dispositive motions are filed. If a dispositive motion is filed, the parties respectfully request the Court to set a joint pretrial statement deadline in any decision or order denying dispositive relief.
8. The parties believe that referral of this matter for mediation X WOULD WOULD NOT be helpful and, both parties consent to such referral. Due to outstanding discovery requests, the parties ask that the referral not be made until August 2016. It is the parties' understanding that such a referral will not suspend the other deadlines in this case unless the parties make such a request by written motion.
9. The parties DO X DO NOT believe that a pretrial conference before the Court would serve any purpose at this time.

Respectfully submitted this 13th day of May, 2016,

Respectfully submitted,

ATTORNEYS FOR PLAINTIFFS

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AND

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CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2016, a copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Evan Shanley